



**IDB COMMUNICATIONS**  
GROUP, INC.

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

July 17, 1992

Ms. Donna R. Searcy, Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

ORIGINAL  
FILE

Re: Alcatel Petition (RM-8004)

Dear Ms. Searcy:

Pursuant to Section 1.405(b) of the Commission's Rules, IDB Communications Group, Inc. hereby submits an original and nine (9) copies of its Reply Comments in the above-captioned proceeding.

Sincerely,

James T. Roche  
General Regulatory Attorney  
(301) 590-7098

JTR/swd

Enclosures

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ORIGINAL

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of )  
 )  
Amendment of Parts 2, 21, 25 and 94 ) RM-8004  
of the Commission's Rules to )  
Accommodate Common Carrier and Private )  
Operational-Fixed Microwave Systems )  
in Bands Above 3 GHz )

To: The Commission

REPLY COMMENTS  
OF  
IDB COMMUNICATIONS GROUP, INC.

IDB COMMUNICATIONS GROUP, INC.

Robert S. Koppel  
James T. Roche

Suite 460  
15245 Shady Grove Road  
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Its Attorneys

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To: The Commission

REPLY COMMENTS  
OF  
IDB COMMUNICATIONS GROUP, INC.

IDB Communications Group, Inc. ("IDB") hereby submits reply comments concerning the above-captioned Petition for Rulemaking filed by Alcatel Network Systems, Inc. ("Alcatel"). In its Petition, Alcatel requests the Commission to amend Parts 2, 21, 25 and 94 of the Rules to accommodate common carrier and private operational-fixed microwave systems in certain specified frequency bands above 3 GHz. IDB's reply comments are filed in support of the satellite operators and users opposing the Petition.

I. Introduction

Alcatel proposes amendments to the Commission's Rules to reallocate the 3.6-3.7, 3.7-4.2, 5.925-6.425, 6.525-6.875, 10.55-10.68 and 10.7-11.7 GHz bands to permit sharing by common carriers and private operational-fixed microwave systems. Alcatel seeks co-primary status for those two user groups in certain of the proposed reallocated bands above 3 GHz. Incumbent

licensees, such as satellite earth station operators in the 4 GHz band, would be on notice and would be required to plan ahead regarding their future spectrum needs. In addition, Alcatel proposes the reallocation of 80 MHz of the 3.7-4.2 GHz band by making the fixed satellite service secondary to the fixed microwave service for those frequencies.

IDB is a leading provider of satellite transmission and distribution services in the United States and around the world. IDB owns and operates major teleport facilities in Los Angeles and New York; a nationwide network of over 30 fixed satellite earth stations in virtually every major metropolitan area; and a fleet of transportable earth stations. IDB provides satellite distribution of both television and radio feeds of most Major League Baseball, National Basketball Association and National Hockey League contests. IDB owns and operates more than 75 satellite earth stations, most of which operate in the C-band.

As a major operator of domestic satellite earth stations, particularly in the C-band, IDB is qualified to address the potential impact of the proposed frequency reallocation on the satellite industry. IDB submits that adoption of Alcatel's frequency reallocation scheme would adversely affect both domestic and international satellite downlinks, which rely on the C-band frequencies proposed for reallocation in the Petition. IDB opposes Alcatel's frequency reallocation scheme because it would severely disrupt IDB's operations and seriously harm IDB's enormous capital investment in C-band earth station facilities,

an investment that was made in reliance on existing frequency allocations and well-established rules.

II. Reallocation Of The 4 GHz Band Would Be Disruptive To The Satellite Operators And Service Providers Who Rely On C-Band.

IDB supports the positions taken by GE Americom, GTE, HBO and Hughes that the Alcatel proposal would seriously harm fixed-satellite users and the general public. C-band satellite service users have made a substantial investment in high technology C-band earth stations in reliance upon the expectation that full use of the 3.7-4.2 GHz band for the provision of C-band downlink services would be protected.<sup>1/</sup> Alcatel's proposed frequency reallocation would adversely impact C-band downlink services. Such a drastic change would harm the satellite industry in its efforts to compete with other service providers such as fiber optic cable system operators.

As pointed out in the opposing comments, Alcatel's proposal would disrupt many C-band satellite services such as video distribution and would further complicate frequency coordination in that band. Alcatel's proposed rule changes for the 4 GHz band do not serve the public interest and will have substantial, and not minimal, impact on the satellite industry.

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<sup>1/</sup> International satellite downlinks also utilize C-band frequencies. Extended C-band frequencies in the 3625-3700 MHz band were cleared by NTIA on May 25, 1991 for use with INTELSAT space segment. INTELSAT VI uses a downlink in the 3629-3701 MHz band and INMARSAT third generation satellites will utilize feeder links in the 3600-3629 MHz band. In addition, international Ku-band downlinks use the 10950-11200 MHz and 11450-11700 MHz bands.

IDB submits that the Commission should not propose to make the fixed-satellite service secondary to fixed microwave users for any portion of the 3.7-4.2 GHz band. Alcatel has failed to explain why the needs of displaced microwave users could not be met by the continued co-primary use of that frequency band with fixed-satellite operators. In addition, Alcatel's proposal does not provide for displaced satellite operators. Migration to Ku-band is not a viable solution for displaced C-band satellite users. Satellite owners and earth station operators have already invested hundreds of millions of dollars in C-band satellite facilities. Further, because of inferior propagation characteristics, including rain fade, Ku-band will never be an adequate substitute for C-band for many satellite services.

### III. Conclusion

IDB agrees that there is a need to provide spectrum for emerging technologies, but Alcatel's Petition is not the answer. Displacing existing licensees and users in the 4 GHz band in order to accommodate fixed microwave users in the 2 GHz band is not in the public interest and is not justified by the reasons set forth by Alcatel in its Petition.

WHEREFORE, IDB urges the Commission to deny Alcatel's  
Petition and not to issue a Notice of Proposed Rulemaking.

Respectfully submitted,

IDB COMMUNICATIONS GROUP, INC.

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Its Attorneys

July 17, 1992

CERTIFICATE OF SERVICE

I, Susanne Deljoubar, hereby certify that I have this 17th day of July 1992 sent copies of the foregoing "Reply Comments" by first-class U.S. mail, postage prepaid to the following:

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